

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VIRAL BHAGAT,

Plaintiff,

— against —

ANUJA SHARAD SHAH A/K/A ANU SHAH,

Defendant

Case No.: 1:24-cv-01424-VEC

MOTION TO EXPAND THE SCOPE OF  
DISCOVERY

Plaintiff, Viral Bhagat, respectfully moves this Court to modify the current discovery scope to include materials and information from **April 1, 2022, to the present**, instead of the currently limited period beginning **January 1, 2023**. This extension is necessary to ensure a complete and fair discovery process that encompasses key events relevant to Plaintiff's claims.

**RELIEF REQUESTED**

Plaintiff requests that this Court expand the discovery period to cover April 1, 2022, to the present, allowing Plaintiff access to relevant documents and communications necessary for a fair adjudication of this case.

Dated: San Francisco Bay Area, CA

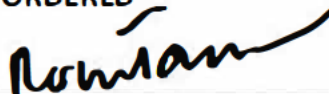
March 15, 2025

Defendant shall file a letter responding to this letter-motion by **March 24, 2025**. SO ORDERED.

Dated: March 19, 2025

New York, NY

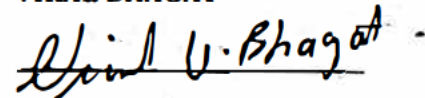
SO ORDERED



ROBYN F. TARNOFSKY

UNITED STATES MAGISTRATE JUDGE

VIRAL BHAGAT



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*Pro Se*